

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ALI RAZAK, KENAN SABANI, AND
KHALDOUN CHERDOUD,

Plaintiffs,

v.

UBER TECHNOLOGIES, INC. AND
GEGEN LLC,

Defendants.

Civil Action No. 2:16-CV-00573-MMB

Judge Michael M. Baylson

**DEFENDANTS' MOTION *IN LIMINE* TO PRECLUDE EVIDENCE
OUTSIDE STIPULATED SCOPE OF THE TRIAL**

Defendants Uber Technologies, Inc. and Gegen LLC (collectively, “Defendants”), by and through undersigned counsel, and pursuant to the Court’s Report of Final Pretrial Conference (ECF No. 153), hereby move the Court for an Order precluding Plaintiffs Ali Razak, Kenan Sabani, and Khaldoun Cherdoud (collectively “Plaintiffs”) from introducing at trial any evidence, testimony, or argument inconsistent with the parties’ stipulations and the corresponding Court orders limiting the scope of the upcoming trial. (See ECF Nos. 138 & 148). The reasons supporting this Motion are more fully set forth in Defendants’ accompanying Memorandum of Law, which is incorporated herein by reference.

WHEREFORE, Defendants respectfully request that the Court grant their motion *in limine* to exclude from trial any evidence or argument concerning information outside the limited scope stipulated to by the parties, including, *inter alia*, different geographic locations or markets (*i.e.*, outside of Philadelphia), Uber ride types other than UberBLACK (*e.g.*, uberX), time periods (*e.g.*, on or after January 11, 2018), other individuals utilizing Uber’s ride-sharing mobile phone application to provide UberBLACK transportation services (*i.e.*, other drivers), or Plaintiffs’

alleged damages. This exclusion would include, *inter alia*, Plaintiffs' Exhibits 116-147.

Dated: February 1, 2024

Respectfully submitted,

/s/Robert W. Pritchard

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Attorneys for Defendants
UBER TECHNOLOGIES, INC. AND
GEGEN LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of February 2024, **Defendants' Motion *In Limine* to Preclude Evidence Outside Stipulated Scope Of The Trial** was filed using the Eastern District of Pennsylvania's ECF system, through which this document is available for viewing and downloading, causing a notice of electronic filing to be served upon all counsel and parties of record.

/s/Robert W. Pritchard